I have read all of the comments on the Order re HAC and find it to be realistic and correct. I do, however, believe that reduced power is not required. Tests of directional antenna By Starkey Laboratory indicate that RF interference can be solved by their use. Also Hearing Aids are now being make that are RF Immune. Making hearing aids RF immune, however does not solve the base band magnetic interference to the hearing aids telecoils. The writer has conducted tests that show that this source of interference can be solved by using magnetic self cancellation which was demonstrated to FCC engineers. The inductive coupling of the wireless telephone to the hearing aid's telecoil is solved by replacing the telephones electret speaker with a magnetic type speaker which leaks magnetic energy or by simple and inexpensive device for which there is a provisional patent. ANSI 63.19 endorsed by the FCC. however, does not specify the maximum allowed magnetic field generated by the telephones battery and associated wiring which is sorely needed to determine whether a wireless phone is truly HAC and would be of great benefit to a cell phone manufacturer trying to manufacturer a phone that meets the requirement of the HAC order.

Respectfully Submitted,

George DeVilbiss